

## REMARKS

### I. Summary of Office Action

Claims 1-24 are now pending in the application.

The Examiner rejected claims 1, 5-9, 11, 12, 16, and 21-24 under 35 U.S.C. § 102(e) as being anticipated by Norden-Paul et al. U.S. Patent No. 5,247,611 (hereinafter "Norden-Paul").

The Examiner rejected claims 2-4 and 17-20 under 35 U.S.C. § 103(a) as being unpatentable over Norden-Paul in view of Capson et al. U.S. Patent No. 5,701,499 (hereinafter "Capson").

The Examiner rejected claim 10 under 35 U.S.C. § 103(a) as being unpatentable over Norden-Paul in view of Ammirato et al. U.S. Patent No. 5,303,146 (hereinafter "Ammirato").

The Examiner rejected claims 13-15 under 35 U.S.C. § 103(a) as being unpatentable over Norden-Paul in view of Ammirato and in further view of Smokoff et al. U.S. Patent No. 5,682,526 (hereinafter "Smokoff").

### II. Summary of Applicant's Reply

Applicant has amended independent claims 1 and 16 in order to particularly point out and distinctly claim the subject matter which applicant regards as his invention.

The Examiner's rejections of the claims are respectfully traversed.

Reconsideration of this application is respectfully requested.

### III. The Rejection of Independent Claims 1 and 16 Under 35 U.S.C. § 102(e)

The Examiner rejected each of pending independent claims 1 and 16 under 35 U.S.C. § 102(e) as being unpatentable over Norden-Paul. The Examiner's rejection of these claims under this section is respectfully traversed.

Applicant respectfully submits that, contrary to the Examiner's contention, each of independent claims 1 and 16 is allowable for at least the reasons set forth below.

**A. Applicant's Independent Claims are Allowable Over Norden-Paul**

Applicant's independent claim 1 relates to a method for dynamic spreadsheet reporting.

As defined by independent claim 1, the method includes:

- a) providing an electronic spreadsheet having a plurality of cells that are arrayed in a defined number of columns and rows;
- b) providing a database in communication with said electronic spreadsheet;
- c) receiving an expansion formula in at least one of said plurality of cells that comprises at least one dimension member and instructions for expansion, said expansion formula functioning to control retrieval of data associated with said at least one dimension member;
- d) in response to rendering said electronic spreadsheet, using said at least one dimension member from said expansion formula to query said database to retrieve data associated with said at least one dimension member from said database;
- e) storing said retrieved data associated with said at least one dimension member from said expansion formula in a cache for use to respond to one or more queries to said database for said at least one dimension member;
- f) using said instructions for expansion from said expansion formula to automatically adjust at least one of the defined number of said columns and rows to accommodate said data responsive to said querying of said database; and
- g) populating said adjusted columns and rows with said retrieved data while maintaining the operation and functionality of said electronic spreadsheet.

Norden-Paul, on the other hand, describes methods and systems for providing automated records management. In particular, the Norden-Paul system includes a spreadsheet. "Each cell [of the spreadsheet] is separately identified by one or more parameters which often act as row and/or column labels." (*See, e.g.*, Norden-Paul, column 3, lines 5-7.) In addition, the size of each cell may be changed depending on the information displayed within the cell.

Applicant respectfully submits that, contrary to the Examiner's contention, Norden-Paul does not show or suggest the method defined by independent claim 1 for at least the reasons set forth below.

**(i) Norden-Paul Does Not Show or Suggest an Expansion Formula**

As recited above, applicant's claim 1 requires "receiving an expansion formula in at least one of said plurality of cells that identifies comprises at least one dimension member and instructions for expansion." As explained in applicant's specification, "a 'one-line' [expansion]

formula may be utilized to prompt the required interaction(s) with the associated database containing relevant data/information and thereby achieve the desired dynamic spreadsheet reporting functionality.” (*See, e.g.*, Applicant’s specification, paragraph [0040].) This expansion formula allows a user to, among other things, “(i) specify whether to expand/vary the report by row or by column, (ii) define which member to base an expansion/variation on, and (iii) define expansion/variation parameters. (*See, e.g.*, Applicant’s specification, paragraph [0045].)

Contrary to the Examiner’s suggestion on pages 2-3 of the Office Action, column 6, lines 65-68 and column 8, lines 1-5 of Norden-Paul (or any other portion of Norden-Paul) do not show or suggest “an expansion formula in at least one of said plurality of cells that comprises at least one dimension member and instructions for expansion a message template.” Rather, Norden-Paul merely shows a spreadsheet where “[t]here are three basic types of information fields in [a] cell: mandatory information fields designed by dashed lines 201 and 202; optional information fields designated by dashed line 203; and notational information fields designated by dashed lines 204-206.” (See Norden-Paul, column 5, lines 6-11.) “The cell sizes may be adjusted depending upon whether any of the foregoing notations are to be displayed within a cell.” (See Norden-Paul, column 6, lines 65-67.) For example, “because comment field 332 of form 320 is empty, the size of cell 130 is adjusted by reducing its height.” (See Norden-Paul, column 5, lines 58-59.) Nowhere does Norden-Paul show than an expansion formula is received in at least one of the cells.

In addition, applicant wishes to point out to the Examiner that the size of each cell is adjusted based on the entry of information or retrieval of information into the informational fields. That is, Norden-Paul does not adjust the size of each cell by using instructions for expansion from the expansion formula, as recited in applicant’s claim 1. As explained in Norden-Paul, the flowcharts of FIGS. 12A and 12B show that the process determines whether the field is required to be displayed. If the field is to be displayed, the process then determines whether the attribute has a value and, if it does, “the value is put into the field.” However, if the field is not required, “the process moves to decision step 657 and determines if the field is optional or notational.” (See Norden-Paul, column 7, lines 43-55.) Thus, this process described in Norden-Paul determines whether a field is, as explained above, mandatory, optional, or notational and places a value into the field, if available. In this process, new lines may be added to accommodate values placed into the fields, thereby increasing the size of the cell. Unlike

applicant's invention, nowhere does Norden-Paul show an expansion formula that includes "at least one dimension member" and "instructions for expansion," as defined in applicant's independent claim 1.

Accordingly, applicant respectfully submits that Norden-Paul fails to show or suggest a method that, among other things, "receiv[es] an expansion formula in at least one of said plurality of cells that identifies comprises at least one dimension member and instructions for expansion."

(ii) **Norden-Paul Does Not Show or Suggest Storing Said Retrieved Data**

As recited above, applicant's claim 1 requires "storing said retrieved data associated with said at least one dimension member from said expansion formula in a cache for use to respond to one or more queries to said database for said at least one dimension member." Norden-Paul does not show or suggest this element of applicant's claimed invention.

As explained above, Norden-Paul merely determines whether a field is mandatory, optional, or notational and, in response, places a value into the field, if it is available. In contrast to applicant's claimed invention, Norden-Paul does not show or suggest receiving an expansion formula that has a dimension member and using the dimension member to query the database to retrieve data associated with the dimension member. In addition, the system of Norden-Paul does not show or suggest storing the retrieved data in a cache for use to respond to one or more queries to the database for the dimension member. Instead, as explained above, Norden-Paul only describes a process for reading the fields associated with each cell. In fact, nowhere in Norden-Paul is it shown or suggested that the system stores "said retrieved data associated with said at least one dimension member from said expansion formula in a cache for use to respond to one or more queries to said database for said at least one dimension member" as required by claim 1.

Accordingly, applicant respectfully submits that Norden-Paul fails to show or suggest a method that, among other things, "stor[es] said retrieved data associated with said at least one dimension member from said expansion formula in a cache for use to respond to one or more queries to said database for said at least one dimension member."

In view of the foregoing, applicant respectfully submits that independent claim 1 is allowable over Norden-Paul. Therefore, applicant respectfully requests that the rejection of claim 1 be withdrawn by the Examiner.

Similarly, the remaining independent claim 16 is allowable for at least the same reasons. Therefore, applicant respectfully requests that the rejection of independent claims 16 also be withdrawn by the Examiner.

#### **IV. The Rejection of Claims 2-15 and 17-24 Under 35 U.S.C. §§ 102(b) and 103(a)**

The Examiner rejected each of dependent claims 5-9, 11, 12, and 21-24 under 35 U.S.C. § 102(e) as being anticipated by Norden-Paul. The Examiner rejected claims 2-4 and 17-20 under 35 U.S.C. § 103(a) as being unpatentable over Norden-Paul in view of Capson. The Examiner rejected claim 10 under 35 U.S.C. § 103(a) as being unpatentable over Norden-Paul in view of Ammirato. The Examiner rejected claims 13-15 under 35 U.S.C. § 103(a) as being unpatentable over Norden-Paul in view of Ammirato and in further view of Smokoff. Applicant respectfully traverses the Examiner's rejections.

Applicant respectfully submits that dependent claims 2-15 and 17-24 each of which depends from one of independent claims 1 and 16, are allowable for at least the same reasons that the independent claims are patentable as set forth above. Therefore, applicant respectfully requests that the Examiner withdraw the rejections of claims 2-15 and 17-24.

## CONCLUSION

Applicant respectfully submits that, as described above, the cited prior art does not show or suggest the combination of features recited in the claims. Applicant does not concede that the cited prior art shows any of the elements recited in the claims. However, applicant has provided specific examples of elements in the claims that are clearly not present in the cited prior art.

In addition, each of the combination of limitations recited in the claims includes additional limitations not shown or suggested by the prior art. Therefore, for these reasons as well, applicant respectfully requests withdrawal of the rejection.

Further, there is no motivation shown to combine the prior art cited by the Examiner, and even if these teachings of the prior art are combined, the combination of elements of claims, when each is interpreted as a whole, is not disclosed in the Examiner's proposed combination. As the combination of elements in each of the claims is not disclosed, applicant respectfully requests that the Examiner withdraw the rejections.

Applicant strongly emphasizes that one reviewing the prosecution history should not interpret any of the examples applicant has described herein in connection with distinguishing over the prior art as limiting to those specific features in isolation. Rather, applicant asserts that it is the combination of elements recited in each of the claims, when each claim is interpreted as a whole, which is patentable. Applicant has emphasized certain features in the claims as clearly not present in the cited references, as discussed above. However, applicant does not concede that other features in the claims are found in the prior art. Rather, for the sake of simplicity, applicant is providing examples of why the claims described above are distinguishable over the cited prior art.

Applicant wishes to clarify for the record, if necessary, that the claims have been amended to expedite prosecution. Moreover, applicant reserves the right to pursue the original subject matter recited in the present claims in a continuation application.

Any narrowing amendments made to the claims in the present Amendment are not to be construed as a surrender of any subject matter between the original claims and the present claims; rather merely applicant's best attempt at providing one or more definitions of what the applicant believes to be suitable patent protection. In addition, the present claims provide the intended scope of protection that applicant is seeking for this application. Therefore, no estoppel

should be presumed, and applicant's claims are intended to include a scope of protection under the Doctrine of Equivalents.

Further, applicant hereby retracts any arguments and/or statements made during prosecution that were rejected by the Examiner during prosecution and/or that were unnecessary to obtain allowance, and only maintains the arguments that persuaded the Examiner with respect to the allowability of the patent claims, as one of ordinary skill would understand from a review of the prosecution history. That is, applicant specifically retracts statements that one of ordinary skill would recognize from reading the file history were not necessary, not used and/or were rejected by the Examiner in allowing the patent application.

For all the reasons advanced above, applicant respectfully submits that the rejections have been overcome and should be withdrawn.

For all the reasons advanced above, applicant respectfully submits that the Application is in condition for allowance, and that such action is earnestly solicited.

## AUTHORIZATION


The Commissioner is hereby authorized to charge any additional fees, which may be required for this Amendment, or credit any overpayment to Deposit Account No. 08-0219.

In the event that an Extension of Time is required, or which may be required in addition to that requested in a petition for an Extension of Time, the Commissioner is requested to grant a petition for that Extension of Time which is required to make this response timely and is hereby authorized to charge any fee for such an Extension of Time or credit any overpayment for an Extension of Time to Deposit Account No. 08-0219.

Respectfully submitted,

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